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Environmental  
Protection

# California Regional Water Quality Control Board

## Los Angeles Region

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Gray Davis  
Governor

July 18, 2003

Interested Parties

### **SUNSHINE CANYON LANDFILL PROPOSED CITY EXPANSION – RESPONSES TO COMMENTS RECEIVED (FILE No. 58-076)**

On June 6, 2003, Regional Board staff released copies of tentative Waste Discharge Requirements (WDRs) for a proposed expansion of the Sunshine Canyon City Landfill. In addition, a public workshop was held in Granada Hills on June 18, 2003, to obtain comments from concerned parties regarding this proposed expansion. Staff have prepared the attached summary which lists written comments received at the public workshop, those submitted to the Regional Board, and also staff responses to these comments. Verbal comments made at the public workshop were addressed at the workshop.

The tentative WDRs have been revised to reflect comments received and may be viewed online at [http://www.swrcb.ca.gov/~rwqcb4/html/permits/tentative\\_permits.html](http://www.swrcb.ca.gov/~rwqcb4/html/permits/tentative_permits.html)

If you have any comments or questions, please call me at 213-620-6119.

Rodney H. Nelson  
Senior Engineering Geologist  
Landfills Unit

Attachment (all)

cc: See Mailing List

### **California Environmental Protection Agency**

\*\*\*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption\*\*\*  
\*\*\*For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>\*\*\*



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Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

## SUNSHINE CANYON LANDFILL MAILING LIST

### **Firms and Agencies:**

Joe Mello, Land Disposal Program, State Water Resource Control Board  
 Michael Lauffer, Office of Chief Counsel, State Water Resources Control Board  
 Robert Sams, Office of Chief Counsel, State Water Resources Control Board  
 Peter Janicki, California Integrated Waste Management Board, Sacramento  
 Bill Marciniack, California Integrated Waste Management Board, Fullerton  
 Kit Cole, California Integrated Waste Management Board, Sacramento  
 Michael Driller, California Department of Water Resources  
 Margaret Clark, Vice Chair, LA County Integrated Waste Management Task Force  
 Virginia Maloles, Los Angeles County, DHS  
 David Thompson, City of Los Angeles, Environmental Affairs Department  
 Larry Israel, South Coast Air Quality Management District, Diamond Bar  
 Melvin Blevins, Upper Los Angeles River Area Watermaster  
 David Edwards, Browning-Ferris Industries, Inc.  
 Mary Edwards, North Valley Coalition  
 Esther Simons, LASER – Com. Ad. Com. Sunshine Canyon  
 Sharon Rubalcava, Weston Benshoof Rochefort Rubalcava MacCuish, LLP  
 David Edwards, Browning-Ferris, Inc.  
 Krzysztof Jesioneck, GeoSyntec Consultants, Walnut Creek  
 Ali Mehrazarin, A-Mehr, Inc

### **Individuals**

Jerry Slaton	Robert Rickette	Lori Austein	Michael Brooks
Michael Godfrey	Gary Washburn	Anne Ziliak	Peilien Wag
S Rooholomaini	Erwin Miller	Ilya Margulis	Gary Simmons
George Edwards	Carolyn Lu	M.J. Stewart	Jennie Wag
Kelly O'brien	Marc Gomesman	Dr. Joyce Edelman	Jinderpal Bahndal
Becky Bendikson	Jay Atkinson	Robert Stanley	Xiangqun Jin
Dr. Wayne Aller	Kim Thompson	Arlette/Vince -Rojas	Maxwell Gottesman
Guq Laughnome	Ariel Summerlin	Kirk/Jacqueline Meogo	Curt Fuji
Dr. Jim Should	Yvonne Karukas	Kim Tran	Richard/Maria Fisk
Syd Temple	Sharon Rubalcava	Amy/Len Posner	Albert Johnson
Judy/Stephen	Bob/Phillis Kittner	Bob Haueter	Dave Parikh
Ralph Kroy	John/Marilyn Secxar	Nancy Reinhardt	Wanda George
Kevin/Laura Stack	Jim Aidukas	Jan Fambro	Susan Tipton
Barbara Carney	Ernest Hilberg	Irene Tomlinson	Anna Wimsatt
Luella/Brian Massau	Robert Ruhl	Van Steen	Zooni Wom
Fred Renwald	W.L. Lane	Elaine Gottesman	Mr./Mrs. Navickas
Barbara Iverson	Ed Kavazanjian	Sam/Jan Luongo	Sherman Klein
Joe Yitti	Elise Kaplan	Mr. /Mrs. Kubota	Sam Rojas
Ralph Iverson	Greg Smith	Hank/Anne Feldmann	Michael Tou
Cherie Mann	Alycia Seaman	John/Sue Hendricks	Carol Ruhl
Darrac Coate	Alan Cueba	Catherine Scott	
Bill Brown	Ruth Daush	Howard Wag	

No.	Commenter (Date Received)	Item	Comment	Response
1.	<p>State Assembly Member Dr. Keith Richman (A letter dated March 28, 2003 to the US Army Corps of Engineers. Read by Mr. Gary Washburn at the June 18, 2003 public workshop)</p>		<p>Permit for the proposed landfill expansion should be denied because a vital water supply for millions of residents is at risk.</p>	<p>Sunshine Canyon Landfill is located at the northern edge of the San Fernando Valley Basin, which is a major drinking water resource. Pollutants in landfill leachate could be carried out of the Canyon and enter the groundwater basin. However, because of the low permeability of the bedrock that underlies the landfill and the distance between the landfill and the San Fernando groundwater basin, the possibility that pollutants from the landfill would enter the groundwater basin is very low. With the protective measures applied at the landfill (i.e., liner systems, groundwater extraction trench, and cutoff walls), no pollutants should be released from the landfill to the groundwater basin. Should this unlikely event occur, groundwater monitoring should provide early detection.</p> <p>It is possible that pollutants from the landfill could be carried to the Los Angeles Reservoir, which is approximately 1.5 miles from the landfill's entrance, by wind blown particles and birds. This issue has been addressed in the Subsequent Environmental Impact Report (SEIR) that was certified by the Los Angeles City Council in 1999. BFI is required by the City to employ mitigation measures to control fugitive dust generation at the site. During the more than 40 years of operational history at Sunshine Canyon Landfill, there has been no record of any water quality problems at the reservoir associated with the landfill.</p> <p>It is unlikely that pollutants released from the landfill would enter the reservoir through a groundwater pathway, because the bottom of the reservoir is higher than the local groundwater table.</p>
2.	<p>Ralph Kroy (June 18, 2003)</p>	A	<p>The proposed landfill will be one of the largest landfills in the country, almost across the street, and over two hundred feet above the largest water treatment plant in the United States.</p>	<p>Refer to Comment/Response No. 1</p>

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		B	The landfill is in one of California's most seismically active areas. The expectations that a thin plastic liner will survive the onslaught of mother nature's extreme forces is a stretch, bordering on negligent planning.	The State of California requires all Class III landfills, such as Sunshine Canyon Landfill, that are permitted to take municipal solid waste to be constructed to withstand the largest earthquake that is expected to occur every 100 years. Moreover, Regional Board has required Sunshine Canyon Landfill (and every other operating Class III landfill in our Region) to be built to withstand the largest earthquake that could affect the landfill, regardless of time. This is the same standard (earthquake design) that is required for Class I hazardous waste landfills.
		C	For the same period, Sunshine Canyon Landfill has record of ninety-two violations, while the nearby Simi Valley Landfill had no violations at all.	The violations referred to were issued by the local enforcement agency (County of Los Angeles) on daily operation activities that are not directly related to water quality issues. There have been three violations and non-compliance of WDRs since 1996 when the County Extension Landfill started operations.
3.	John Hendricks (June 18, 2003)		All open pit landfills leak leachate. In 40, 50, 60 years, landfill operators and regulators will not be around to deal with the problem.	The proposed landfill will be equipped with a liner and leachate collection system. Leachate collected at the landfill is discharged to the sanitary sewer system and treated at a wastewater treatment plant. Municipal solid waste that will be buried in the landfill will go through chemical and physical changes, produce leachate and landfill gas, and will gradually stabilize over time. Under current Federal and State regulations, landfill owner/operators are responsible for the post-closure maintenance for at least 30 years, or as long as required, until the closed landfill is no longer a threat to the environment.
4.	Becky Bendikson (June 18, 2003)	A	The Regional Board needs to consider the accumulative impacts of all (inactive, active, and planned) landfills at the site and ensure that under no circumstances will the future of Los Angeles' water be placed in peril.	Board staff have considered the accumulated impacts of all landfill units at the site. All the units at the site are regulated by waste discharge requirements (WDRs) that are designed to protect the water resources of the State. If any of the WDRs are found not to protect water quality, the WDRs will be revised or be replaced by enforcement orders.

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		B	At the very least, the Water Board should require that a double liner system be installed.	Double composite liner systems are required for Class I and Class II landfills because the wastes discharged to such landfills are a much bigger threat to the environment than the non-hazardous solid waste disposed at Sunshine Canyon Landfill and other Class III landfills. Nevertheless, a multiple layer composite liner system is required at Sunshine Canyon Landfill for the leachate collection sumps, which are the most critical portion of a liner system.
		C	The Regional Board should consider requiring the installation of a off-site monitoring well(s) outside of the landfill entrance between the mouth of the canyon and Balboa Inlet Tunnel.	Groundwater monitoring wells for landfills are designed to detect the release of pollutants from the landfill units to ground water. Monitoring wells are located where they will provide earliest warning of a pollutant release. At this time, there is no indication that pollutants from the landfill have moved offsite or even close the boundary of the landfill property. The Regional Board will require BFI to install off-site monitoring wells whenever there is evidence indicating that any contamination plume is moving towards or across the landfill property boundary.
		D	The Regional Board should establish and maintain a website posting in a timely fashion the results of all water testing and any violations.	All water quality monitoring data submitted to the Board and any document addressing permit violations are kept at the Regional Board (file No. 58-076) and are available for public review. Electronic posting of data will be done as resources become available.
5.	North Valley Coalition (June 18, 2003)	A	The Regional Board must prepare WDRs that encompass the entire operation including the County Side Landfill.	It is common for the Regional Board to issue multiple WDRs for different units within a single landfill, or for the same landfill unit at different times, to ensure that the operations at the site are adequately regulated. The County Extension Landfill is not included in the tentative WDRs because: 1) It is permitted by a separate Solid Waste Facility Permit and different Local Enforcement Agency (The County of Los Angeles) and 2) It is currently regulated by Board Orders No. 91-091 and No. 93-062 (Super Order). When evaluating monitoring data or considering any enforcement actions, Board staff will take account the entire Sunshine Canyon Landfill site, including both the City Landfill and County Extension Landfill. The fact that the City and County portions of the landfill are regulated by different WDRs will not reduce BFI's responsibility or liability under the California Water Code and federal and state landfill regulations.

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		B	There shall be no modification of the adopted WDRs without public participation and comment.	Public hearings for adoption or revision of WDRs at the Regional Board are required. If any modification of the adopted WDRs is required, the public will be informed at least 45 days prior to the Board meeting during which the item will be heard.
		C	Upon commencement of the project, and at least annually thereafter, the proponent shall fund an independent State inspection and testing of all wells with the samples being processed by the State at a State run laboratory.	BFI is required to conduct water quality monitoring in accordance with US EPA certified methods. Water samples must be submitted to laboratories that are certified the by the California Department of Health Services. Analytical data submitted to the Regional Board, including field notes, chain of custody, and quality control and quality assurance (QA/QC) data, are carefully reviewed by Board staff. Regional Board staff take groundwater samples at the landfills as an oversight function.
		D	A double liner system shall be installed.	Refer to Comment/Response No. <a href="#">4.B</a>
		E	Installation of off-site monitoring wells between the landfill entrance and sensitive receptor down-gradient.	Refer to Comment/Response No. <a href="#">4.C</a>
		F	A State inspector shall be present at all times during the cut-off wall construction and installation.	The tentative WDRs requires BFI to submit detailed design plans for the cut-off wall that will be installed at the entrance area of the landfill. Board staff will carefully review the designs to ensure that the cut-off wall will cut off the shallow groundwater flow within the alluvium at the mouth of Sunshine Canyon. During the installation of the cut-off wall, Board staff, as well as inspectors from the City of Los Angeles, will conduct site inspections to ensure that the wall is constructed as designed. This multi-agency oversight ensures that the cut-off wall will be properly constructed.
		G	There should be no discharge of leachate, condensate, or treated water into, or through, the buffer-zone adjacent to the residential community.	Leachate and gas condensate generated at the Sunshine Canyon Landfill are currently being discharged to the sanitary sewer system which does pass through the buffer-zone adjacent to the residential community. The odor problem that has been reported by some residents in the area is being investigated by the City of Los Angeles and AQMD. If it is concluded that the odor is caused by the leachate and gas condensate from the landfill, BFI will be required to correct the problem.

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		H	There should be no reuse of leachate or condensate or release onto, or into, the landfill in any form.	The tentative WDRs (Sections E.12. and E.13.) prohibit the discharge of gas condensate and leachate back to the landfill without the approval of the Executive Officer. The Executive Officer will not approve such activities unless it is demonstrated that such practice will not endanger water quality during the operation, final closure, and postclosure maintenance of the landfill.
		I	The proponent should maintain a current up-to-date website that will contain the results of all the required testing, including a record of any water-related violations and any proposed changes in operation involving water.	Refer to Comment/Response No. 4.D for the availability of water quality monitoring data.
		J	The WDRs should be consistent with the conditions of the operating permit and the conditions adopted by the City of Los Angeles, including any prohibitions of certain covers and the acceptance of sludge, ash, etc.	To be consistent with the Solid Waste Facility Permit that was issued by the California Integrated Waste Management Board (CIWMB) on May 21, 2003, Section B.7. of the tentative WDRs is being modified to read <i>“No septic tank or chemical toilet wastes, sewage sludge, incinerator ash, asbestos or asbestos products, or dead animals, shall be disposed of at Phase I of City Landfill Unit 2.”</i>
		K	Green waste should not be used as daily cover	The California Integrated Waste Management Board (CIWMB) is the agency that regulates materials that may be used as alternate daily cover (ADC). Green waste has been approved by the California Integrated Waste Management Board for use as alternate daily cover throughout California. Based on the results of a study performed by the Los Angeles Health Department, Solid Waste Division (the local enforcement agency for the CIWMB) Regional Board staff determined that the use of green waste met the performance standards for daily cover. The Puente Hills and Calabasas Landfills operated by the County Sanitation Districts of Los Angeles County currently use green waste as alternate daily cover.

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		L	Stormwater collected at sedimentation basins should be tested first and the results made available before any reuse and /or release off-site.	Stormwater discharge at the Sunshine Canyon Landfill is regulated by the National Pollutant Discharge Elimination System (NPDES) General Stormwater Permit. The tentative WDRs contains specific requirements for the onsite use of any waste water, including retained stormwater. BFI is required to regularly monitor the quality of stormwater discharge and any water used onsite (other than potable water) and submit analytical data to the Regional Board. Enforcement actions will be taken if any violation to the Stormwater Permit and the WDRs is observed. Requiring analysis of stormwater before release may contribute to localized flooding and, subsequently, not considered feasible.
		M	The drainage channel that carries surface water off-site is cracked and should be repaired before the project is allowed to go forward.	The drainage channel that carries surface water from the facility to the Los Angeles River belongs to the Los Angeles County Flood Control District. Board staff will forward this comment to the District. At this time, Board staff do not see the drainage channel as posing a hazard to surface and groundwater.
		N	If State inspectors are required to inspect suspicious loads, including untreated medical waste, and fail to do so, the waste, under no circumstances, will be buried at the landfill.	The daily operations of Class III landfills, including the in inspection of suspicious loads such as untreated medical wastes, are regulated by CIWMB and the City of Los Angeles. Regional Board staff will forward this comment to the appropriate agency representatives.
		O	Video cameras should cover the working face of the landfill and the location where the required random daily load inspections take place.	Refer to Comment/Response No. <a href="#">5.N</a> .



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		P	There should be a prohibition against the acceptance of sludge and sludge products (digester screenings, floatable scum blankets, etc.), all radioactive wastes, including low-level radioactive waste, in any form, and contaminated soil.	<p>Regarding the acceptance of sludge and sludge products, refer to Comment/Response No. 5.J.</p> <p>Regarding the acceptance of radioactive wastes, To clarify the prohibition of the acceptance of radioactive wastes at the site, Section B.4. of the tentative WDRs is being modified to read “<i>No radioactive waste, including low level radioactive waste, as defined by the agency with jurisdictional authority, shall be disposed at Phase I of City Landfill Unit 2.</i>”</p> <p>Regarding the acceptance of contaminated soil, this Regional Board permits the acceptance of only nonhazardous contaminated soil at Class III landfills, including the Sunshine Canyon Landfill. Contaminated soils that must be treated as hazardous wastes or designated wastes are not permitted to be discharged at Class III landfills.</p>
		Q	Purchase and maintain emergency generators to guard against shut down of power to incineration equipment during an earthquake.	Incineration equipment at the landfill is regulated by the South Coast Air Quality Management District (AQMD). Board staff will forward this comment to AQMD.
6.	Michael Goldfrey (June 19, 2003)	A	With the expansion of the landfill, BFI has built a mountain of garbage, two thousand feet in elevation directly above the homes, and school, and located next to the largest water treatment facility in the entire United States. This water treatment facility provides a water supply to the entire Los Angeles metropolitan community.	Refer to Comment/Response No. 1.
		B	No current research can guarantee the integrity of the proposed liners beneath the landfill will protect the Los Angeles metropolitan water supply during a major earthquake.	Refer to Comment/Response 3.B and 7.B.

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		C	Residents and the children attending the local schools can expect to experience increased odor, more blowing dust, possibly respiratory distress and other health risks. Before the Regional Board grants any permits to the landfill expansion, a comprehensive health survey to evaluate all of the risks involved should be conducted.	The health risk involved in the proposed landfill expansion has been extensively addressed in the Final Subsequent Environmental Impact Report (SEIR) that was certified by the City of Los Angeles on October 27, 1999. Certification of the SEIR is required before the Regional Board can adopt WDRs. This issue has been forwarded to the California Office of Environmental Health Hazard Assessment (OEHHA) for review.
7.	Barbara Iverson (June 20, 2003)	A	There is really no way to control what goes into the dump. BFI cannot inspect the loads of city trash that come from the black cans we use for non-recyclable items. All kinds of unacceptable wastes are deposited.	BFI is required to implement a load-checking program at the site to reject unacceptable substances from the incoming wastes. Should inappropriate waste be deposited at the landfill, the pollutants released from such waste will be retained by the liner and leachate collection and removal system.
		B	There is no liner that will hold up over time. Eventually and inevitably, poisonous substances will work their way downhill toward the reservoir and water treatment plant.	The composite liner system is composed of a high-density polyethylene membrane, geosynthetic clay liner or compacted clay materials. Current research has demonstrated that this system is protective of groundwater over time. Regarding the transport of landfill pollutants to nearby groundwater, refer to Comment/Response No. 1.
8.	Esther Simmons (July 7, 2003)	A	A program for remediation of contamination should be implemented and incorporated into the WDRs	BFI is currently required to implement interim corrective measures at the site and has proposed a remediation program including corrective actions. The Regional Board is reviewing BFI's proposed corrective actions to make sure they are adequate. Once the proposed corrective actions have been evaluated and approved by the Regional Board, BFI will be required to implement a Corrective Action Program (CAP) to remediate the pollution.
		B	The addition of a double liner is certainly the first line of defense since it is unarguable that restricted and unacceptable materials will get into the landfill more frequently than we would like to believe.	Refer to Comment/Response No. 1.

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		C	Green waste, as alternate daily cover, is unacceptable at this site even though State and/or Federal Standards allow it.	Refer to Comment/Response No. <b>5.J.</b>
		D	All radioactive waste must be restricted from this landfill	Refer to Comment/Response No. <b>5.P.</b>
		E	BFI in cooperation with the State Department of Health Services should be required to implement a program whereby the inspector and the environmental officer at the landfill can inspect the bags safely so they can make a responsible decision about the transfer or disposal.	Refer to Comment/Response No. <b>5.N.</b>
		F	The community nearest the landfill has been experiencing odor episodes that in some cases, correlated the time when BFI discharges leachate to the sewer system. How will the proposed landfill expansion, which will increase the volume of leachate, impact the neighborhood and what if anything should be done about it?	Refer to Comment/Response No. 5.G.
9.	North Valley Coalition, General Comments (July 8, 2003)	A	When a local or State agency applies more stringent regulation that conflicts with this permit, which regulation applies?	When a local or State agency applies more stringent regulations than those in the WDRs, landfill operators must comply with the more stringent requirements. General Provision L.2. of tentative WDRs states that <i>“These requirements do not exempt BFI from compliance with any other current or future law that may be applicable. They do not legalize this waste management facility, and they leave unaffected any further restraints on the disposal of wastes at this waste management facility that may be contained in other statutes.”</i>
		B	Can we be assured that staff will prepare the answers to these questions, with only minimal informational gathering from BFI?	This Response to Comments has been prepared by Regional Board staff without consultation with BFI.

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		C	Did BFI have any input into the presentation at the public workshop on June 18, 2003? If so, please describe any meetings with staff. Did they assist in any way with the slide presentation?	The slide presentation at the workshop was prepared by Board staff. There was no meeting between Board staff and BFI to discuss the workshop. While some data was derived from reports submitted by BFI, the format and content of the public workshop was the product of Regional Board.
		D	What part if any did BFI have in preparing the answers to the Frequently Asked Questions document distributed at the public workshop on June 18, 2003?	The Frequently Asked Questions were prepared by Board staff based on information available to staff. BFI had no part in preparing the document.
		E	Has the Board provide BFI with any disks or other copies of the tentative WDRs before their release to the public? Were any changes made at the request of the proponent? If so what were they?	The tentative WDRs were sent to BFI the same date as they were released to the public. However, because the tentative WDRs were developed based on the JTD that was submitted by BFI, Board staff rely on BFI for the accuracy and completeness of the information that it provided. During the development of the tentative WDRs, Board staff contacted BFI and its consultants to verify and update such information as was necessary to prepare the tentative WDRs. As our normal practice, working drafts of WDRs are used as a vehicle to carry information during such communication. It should be emphasized that the tentative WDRs have been prepared in accordance with State and Federal regulations. Board staff would not change any requirements in the WDRs because of objections from BFI.
		F	Recommendations on the requirements of seismic standard, double liner, a State inspector onsite during construction, backup generator, funding of annual State inspections, and offsite monitoring wells.	These issues have been addressed in the responses to Comments No. 2.B, 4.B, 5.F, 5.Q, 5.C, and 4.C, respectively.
		G	Require the imposition of fines for significant incidents in amount sufficient to deter future incidents, and with a provision that includes a timeline for a cure that is tied to escalating fines.	When violations involving significant incidents occur at the landfill, the Regional Board will take enforcement action including Cleanup and Abatement Orders, Time Schedule Orders, and Administrative Civil Liabilities in accordance with the California Water Code and the State Water Resources Control Board Enforcement Policy.

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		H	Require that a leachate treatment facility will process all leachate, condensate and subdrain water at all times through out the life of the landfill and beyond until leachate is non longer being produced.	The tentative WDRs prohibit the onsite discharge of leachate and gas condensate unless such discharge is approved by the Executive Officer. Liquids generated at the landfill are currently discharged to the sanitary sewer system under an Industrial Waste Water Permit issued by the City of Los Angeles. Treatment of this wastewater is not required as long the discharge is in compliance with the City's permit.
		I	Delay action on this matter until the EMP and CAP have been submitted and found adequate by staff and the affected public because of BFI's past dismal record.	The requirements for an evaluation monitoring program (EMP) and corrective action program (CAP) for the current City landfill are incorporated in the requirements of the tentative WDRs for the proposed expansion. The proposed expansion will not limit nor impact BFI's obligation or ability to perform an EMP and CAP for a known release as required by state regulations and the tentative WDRs.
		J	Specific Comments to the WDRs and Monitoring and Reporting Program (M&RP).	Refer to Comments Response No. 40
10.	Ralph Kroy (July 8, 2003)	A	Fractures induced by strong earthquakes should be considered when evaluation hydraulic conductivity at the site.	Although fractures induced by strong earthquakes may increased hydraulic conductivity within localized areas, such as along a fault zone, Board staff does not believe that the overall hydraulic conductivity at the landfill we be significantly changed.
		B	Are there any wells or bore holes in the area that are not under the control of BFI, and if so what controls are there?	BFI is the owner and operator of the landfill. All known wells at the site are under the control of BFI.
11.	Becky Bendikson (July 7, 2003)		The comments included are the same as presented in comment No. 5.	Refer to Comment/Response Nos. 5.A through 5.Q
12.	Congress Member Brad Sherman (July 8, 2003)		The landfill's close proximity to an open water source is troubling and only serves as reminder of the possible impacts the expansion will have on Los Angeles County's water source and overall water quality. In addition, the possibility of improper waste discharge poses a serious risk of contamination to groundwater	Refer to Comment Response No. 1.

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			sources.	
13.	J. A. Phillips (July 2, 2003)		The comment expressed concerns on the water filtration plants near the landfill, damage of landfill liners by earthquake, and the impact of the landfill to groundwater.	Refer to Comment/Response Nos. 1 and 2.
14.	Mary Edwards (July 8, 2003)		Request that 401 Certificate be heard at a separate hearing.	The 401 Certification is distinct from the review and approval of WDRs and will be considered at a future time, pending approval of the WDRs.
15.	Maria Hinojosa (June 25, 2003)		The landfill is a health hazard for all residents of the community.	Refer to Comment/Response No. 6.C
16.	Jan Luongo (June 23, 2003)		We need to find an alternative place for landfill.	Alternatives to landfills have been discussed in the SEIR that was certified by the City of Los Angeles in 1999. It is not within the scope of the tentative WDRs to address alternate disposal sites.
17.	Grace Fioretta (July 7, 2003)		The comment expressed concerns on the public school, water filtration plants, and the park near the landfill.	Refer to Comment/Response Nos. 1 and 2.
18.	David Edwards (BFI) (July 8, 2003)	A	General comments on issues raised at the public work shop on June 18, 2003, expressing BFI's position on those issues.	These comments are noted.
		B	Specific comments on findings and requirements in the tentative WDRs M&RP.	Refer to Comment/Response No. 41.
19.	Paul Camellari (July 8, 2003)		The expansion of the landfill should be opposed because of the great potential for groundwater pollution.	Refer to Comment/Response No. 42.
20.	John and Sue Hendricks (June 8, 2003)		The comment letter includes extensive literature to demonstrate that the Landfill is not safe.	Refer to Comment/Response No. 43

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21.	Kathleen Kirby (June 8, 2003)		The comment letter presented a list of the author's friends who have been victims of cancer that may be linked to the landfill.	Refer to Comment/Response No. 6.C
22.	Sally Kolstad (June 8, 2003)		Dust at the landfill may be blown over the ridges to cause pollution.	Refer to Comment/Response No. 1.
23.	Elise Kaplan (June 8, 2003)		Have noticed rusty orange water in a creek near O'Melveny Park. Can all the water in nearby creeks be looked into?	Board staff will investigate possible contamination sources of the creek to verify the sources of the contamination mentioned in this comment.
24.	Jacque Mango (June 8, 2003)		Most people would prefer to pay extra to have trash hauled in to the desert than put up with obvious health hazards to the community.	Refer to Comment/Response No. 16
25.	Joyce Edelman (June 8, 2003)		Very concerned with the proximity of the landfill to the water supply. The landfill is too close to residential areas.	Refer to Comment/Response No. 1
26.	Sue Hendricks (June 8, 2003)		The landfill will breach our water supply.	Refer to Comment/Response No. 1
27.	Iris Shah (June 8, 2003)		Need to find an alternative to burying our trash in our community.	Refer to Comment/Response No. 16
28.	Virginia Madrigal (July 6, 2003, email)		The landfill is too close to schools. Don't make the environment for the children and the community worse than it already is.	Refer to Comment/Response No. 16
29.	Douglas Madrigal (July 6, 2003, email)		The landfill is a hazard to our health and specially dangerous for our children.	Refer to Comment/Response No. 6.C
30.	Harvey B. Abram (July 6, 2003, email)		Contaminated, noxious air from the landfill causes eyes and throats to burn and pollutes the water being stored and flocculated next door.	Refer to Comment/Response Nos. 1 and 6.C.
31.	Jo Ann (July 7, 2003, email)		Very concerned about the water quality if it is contaminated from the landfill.	Refer to Comment/Response No. 1
32.	J.M Srafter (July 7, 2003, email)		We have had enough problems through the years with smells, trash and various	Refer to Comment/Response Nos. 1 and 16

No.	Commenter (Date Received)	Item	Comment	Response
			illnesses from the dump and now we have to worry about the water.	
33.	Mary Anna Kienholz (July 7, 2003, email)		Concerned with affect of wind blown contaminants, earthquakes, and the hydrogen sulfide detected at the County Extension Landfill subdrain system.	Refer to Comment/Response No. 1
34.	Stacy Cornette (July 7, 2003, email)		Concerned with the health of children at the local school.	Refer to Comment/Response No. 6.C.
35.	Beverly Rothman (July 7, 2003, e-mail and hone call)		The landfill has the potential to negatively impact the local water supply.	Refer to Comment/Response No. 1
36.	Albert H Johnston (June 28, 2003, email)		Family experience cancer and breathing problems. Concerned with drinking water resources ?	Refer to Comment/Response No. 6.C.
37.	Linda and Tom Thompson (July 8, 2003, email)		Urging the Board to consider the health and welfare of the community and not to approve the expansion of the landfill.	Refer to Comment/Response No. 6.C.
38.	Karen Savitt (July 7, 2003, email)		Concerned that the expansion of the Sunshine Canyon landfill will place economic benefit over safety, health and welfare of the people.	Refer to Comment/Response No. 6.C.
39.	Darrac Coate' (June 18, 2003)		Geological maps of the Las Angeles Area, including faults at the vicinity of the Sunshine Canyon Area	Refer to Comment/Response No. 2.B.



No.	Commenter (Date Received)	Item	Comment	Response
40.	North Valley Coalition (Specific comments referred in comment 9.J)	40.	Finding No. 4: The statement “ <i>final cover of the City Side Landfill consists of a monolithic soil cover with a minimum thickness of six feet</i> ” is not true. Some portion of the final cover is currently less than six feet.	The six-foot thickness referred to in Finding No. 4 in the tentative WDRs is the minimum thickness required for the final cover <u>after</u> the final closure of the landfill. BFI is required to place additional soil to meet this requirement at all the areas where the thickness of the final cover is less than six feet.
		41.	Finding No. 4: It should also be explained in the WDRs that the 1958 variance granted by the City to the landfill was issued to cover illegal and unregulated dumping at the site and that the operator delayed applying for WDRs for many year after they were required by law to do so.	These comments will be kept in Regional Board’s records for the Landfill. However, the findings in the tentative WDRs are included to support the requirements prescribed in the WDRs. Background information that is not directly related to the requirements is not included in the WDRs.
		42.	Finding No. 5: Because the landfill is at close proximity to water treatment facilities and the liner of the existing landfill is already compromised, a double synthetic liner must be adopted.	Refer to Comment Response Nos. 1 and 4.B.
		43.	Finding No. 5: The acreage of the County Extension Landfill stated in the tentative WDRs is confusing and needs to be clarified. The comment also requests Board staff to review the questions submitted by the NVC to the Los Angeles County on May 15, 2003 regarding the 2001-2002 biennial monitoring report that BFI submitted to the County that had not been responded to.	The 215-acre area of the County Extension Landfill was quoted from Board Order 91-091 (WDRs for the County Extension Landfill) and included in the tentative WDRs as background information. The correctness of this number is not likely to effect any requirements to BFI that are included in the WDRs. Board staff will forward this comment to the County of Los Angeles for verification and clarification regarding the 2001-2002 biennial monitoring report for the County Extension Landfill.
		44.	Finding No. 6: The statement that the County extension landfill will reach its design capacity by approximately 2007 is not confirmed by the material submitted to the County by BFI.	The anticipated year when the County Extension Landfill will reaches its capacity is included in the tentative WDRs as background information. This date does not effect any of the requirements set in the tentative WDRs.

No.	Commenter (Date Received)	Item	Comment	Response
		45.	The final CEQA documents are in conflict with the JTD. Which prevails? Will you provide the modifications and revisions to the JTD for public review, in a timely manner, before these WDRs are heard at the Water Board level?	When there is a conflict between CEQA and the JTD documents, the CEQA document will prevail. The JTD and all its modifications and revisions are public records and may be reviewed at the Regional Board Office.
		46.	Finding No. 13: The “ <i>approximately 20-foot high lifts</i> ” language is not an enforceable limit. The language should be changed to state that “the height of the lifts are not exceed 20-feet”.	The phrase “ <i>approximate 20-foot</i> ” has been replace by “ <i>up to 20-foot</i> ” in the tentative WDRs. It should be noted that Findings in WDRs are not enforceable requirements. They only provide background information.
		47.	Finding No. 13: Strongly object to having any level of contaminated soil used as daily cover.	Refer to Comment/Response No. 5.K.
		48.	Finding No. 15: Will the public be notified when changes to the WDRs are considered?	Refer to Comment/Response No. 5.B.
		49.	Finding No. 9: The A-1 map in the County CUP does not seem to justify the height that was proposed in the JTD. What design was used to calculate capacity and how this affect the projected capacity?	The finding is a general description of the content of the JTD that was submitted for the expansion of the City Side Landfill and is not directly related to the County CUP for the County Extension Landfill. Detailed calculations of the capacity of the proposed landfill expansion are provided in the JTD.
		50.	Finding No. 9: Other comments and concerns relating to the JTD are expressed in the places where they seem appropriate. The NVC believes that the JTD has serious deficiencies and that the JTD and the WDRs documentation do not agree.	If there is any conflict between the JTD and the WDRs, requirements in the WDRs will prevail.
		51.	Finding No. 18: Please add O’Melveny Park to the southwest and west.	The following sentence has been added to the end of Finding No. 18: “ <i>The O’Melveny Park of the City of Los Angeles is located to the west and southwest of the landfill’s property.</i> ”

No.	Commenter (Date Received)	Item	Comment	Response
		52.	Finding No. 19: Bulldozer operators cannot be relied on to recognize, or halt construction, if an unrecorded well is discovered. How can we improve the monitoring requirements and put additional safe guards on the decommissioning of such wells?	The following requirement has been added to Section E.16 of the tentative WDRs to ensue that abandoned wells and bore holes encountered during construction will be properly decommissioned: <i>“If such abandoned wells or bore holes are encountered during construction activities, BFI must notify the designated Board staff contact verbally with 24 hours and in writing within seven days. Such abandoned wells or bore holes must be properly decommissioned before all affected construction activities can proceed.”</i>
		53.	Finding No. 25: The Santa Susana Mountains are the most landslide –prone range in the southern California.	Finding No. 25 is consistent with this statement.
		54.	Finding No. 23: The Santa Susana Fault runs directly through the landfill buffer zone and the oil field land owned by BFI. The California Administrative Code requires that a new Class III landfill not be located on a known Holocene Fault.	The Santa Susana Fault is approximately three miles to the south of the proposed landfill. The proposed landfill expansion is not in violation to the California Administrative Code.
		55.	Finding No. 24: The design of the new unit must meet MCE standard.	Refer to Comment/Response No. 2.B.
		56.	Finding No. 23: “ <i>Santa Susan Fault</i> ” should be “ <i>Santa Susana Fault</i> ”	Typographic error corrected.
		57.	Finding No. 26: Add “and cause pollution” at the end of the paragraph to be consistent with Cleanup and Abatement Order No. R4-2002-0161.	Finding No. 26 has been modified as proposed.

No.	Commenter (Date Received)	Item	Comment	Response
		58.	Finding No. 28: The word “majority” used to define groundwater flow is troubling. Please define more clearly the other paths including (un)weathered bedrock, and the approximate amount of groundwater flow discharge that is not through the alluvium or weathered bedrock.	The statement “ <i>The majority of groundwater flow beneath the Facility occurs within the alluvium and weathered bedrock near the canyon bottoms</i> ” is based on the fact that alluvium and weathered bedrock have much higher permeability than unweathered bedrock. Without further hydrological data, it is difficult to define the groundwater flow more specifically.
		59.	Finding No. 29: The statement that groundwater is currently not beneficially used is not true, because the water can provide groundwater recharge and support wildlife and vegetation.	The last sentence of the Finding No. 29 has been modified to “ <i>Because of high concentrations of salts and low yield, groundwater at the site is currently not used as drinking water.</i> ”
		60.	Finding No. 31: The statement that the Facility is located within the Los Angeles River Watershed Basin is confusing because the JTD states that the majority of groundwater at the site is stored and transmitted in consolidated low permeability sedimentary units located approximately 1 mile north of the San Fernando Groundwater Basin’s northern boundary.	Finding No. 31 discusses the surface water runoff at the site, while statement in the JTD refers to groundwater flow.
		61.	Finding No. 31: Will the Regional Board require offsite monitoring wells to detect contaminants before they reach the Balboa Inlet Tunnel?	Refer to Comment/Response No. 4.C.
		62.	Finding No. 31: Considering that the area is a wind tunnel and that the Los Angeles Reservoir is downwind to the site, how can the Regional Board issue a permit that would put the water of millions people at risk?	Refer to Comment/Response No. 1.

No.	Commenter (Date Received)	Item	Comment	Response
		63.	Finding No. 33: The Regional Board is not limited to consideration of wetlands but may also consider wildlife and vegetation.	Refer to Comment/Response No. 14.
		64.	Finding No. 36: How many of the leachate wells are damaged as opposed to dry? Were they located in spots most likely to detect leachate? How will they be replaced? Is another technology as effective in detecting leachate.	Of the four leachate wells at the City Side Landfill, two are damaged and one is dry. The leachate wells were constructed as part of the Solid Waste Assessment Test (SWAT) investigation in 1988. Although BFI is not required by State or Federal regulations to maintain leachate wells at the unlined City Side Landfill, the Regional Board requires BFI to continue sampling leachate, as one way to identify pollutants that could be released from the landfill to groundwater. Since leachate samples can be obtained from Well No. SR-2, there is no plan to replace this well or the two damaged wells.
		65.	Finding No. 37: BFI constructed an extraction trench in 1990, instead of a cutoff wall, as required by the Regional Board.	Comment is noted. The tentative WDRs require BFI to construct a cutoff wall in addition of upgrading the extraction trench.
		66.	Finding No. 38: Were the lysimeters at the site placed in the optimum location to detected problems? How will they be replaced? Will any other replacement program contain the protection afforded by properly located lysimeters?	Lysimeters are installed at landfills to detect pollutants that may be released from the landfill to the unsaturated zone above the groundwater table. Because of the arid weather and the low permeability of bedrock, lysimeters do not function well at landfills in Southern California. The tentative WDRs require BFI to monitor subdrain water and landfill gas as a substitute for lysimeters.
		67.	Finding No. 40: The channel that carries stormwater off site is severely cracked and fractured and water in the channel could go to ground. Will it be repaired?	Refer to Comment/Response No. 5.M.
		68.	Finding No. 40: Will the removal of sediments by the basins cause the runoff to be more erosive? Will the groundwater extraction trench at the mouth of the canyon be protected from flood during major storms?	Sediments need to be removed because they increase the turbidity of surface water and block storm channels. The fact that water containing less sediment is more erosive is not a concern because the downstream channels do not have erosion problems. Overflowing of the groundwater extraction trench during major storms is not a concern because a) the trench is covered and b) water in the trench is not contaminated.

No.	Commenter (Date Received)	Item	Comment	Response
		69.	Finding No. 41: Needs to be amended by the addition at the end of the sentence to the effect that "Water recovered from the County Extension underdrain system and gas condensate which is treated at the County leachate treatment facility is also discharged here.	The following sentence has been added to the end of Finding No. 41: <i>(The leachate and gas condensate collected at the County Extension Landfill, and any non-storm water that is not used onsite, are also discharged at the sanitary sewer system under the same discharge requirements.)</i> The sentence is in brackets because the tentative WDRs are for the City Landfill only.
		70.	Will the proposed expansion come under the Super Order? Can the Board adopt any regulations that would provide more safeguards for the old City Landfill that are reasonable requirements under the Super Order?	The Super Order was adopted in 1993 to include the requirements contained in the Federal Subtitle D regulations that are more stringent than California regulations at that time. California has since promulgated 27 CCR for the regulation of Class III landfills in the State. When preparing the tentative WDRs, Board staff made efforts to include all the applicable requirements in the Super Order. It is therefore not necessary to cover the proposed landfill expansion under the Super Order.
		71.	Where can a copy of the NPDES General Stormwater Permit be obtained?	Copies of the permit may be obtained at the Regional Board office or from the State Board's website at: <a href="http://www.swrcb.ca.gov/stormwtr/industrial.html">http://www.swrcb.ca.gov/stormwtr/industrial.html</a>
		72.	Finding Nos. 45, 46, 47: Subtitle D Subpart E requires that "within 90 days of triggering an assessment monitoring program, and annually thereafter, the owner or operator must sample and analyze the ground water for all constituents identified in appendix II to this part." Is BFI under this mandate? If so, have they complied for the detection VOCs at MW-10?	The Regional Board issued Cleanup and Abatement Order (CAO) No. R4-2002-0161 on November 4, 2002, for the detection of VOCs at MW-10. The CAO implements Federal and State regulations including Subtitle D. BFI has been in compliance with the CAO since it was issued. The provisions of the CAO have been incorporated into the tentative WDRs.
		73.	Finding No. 47: The detection of VOCs at MW-10 justifies the requirement of offsite monitoring wells.	Refer to Comment/Response No. 4.C.

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		74.	Finding No. 48: What is the process for notifying the public when an AROWD is submitted? How may we get a copy?	Public notice is not required when an AROWD is submitted to the Regional Board. However, AROWDs are public documents and may be reviewed at the Regional Board office. It should be noted that public notice is issued when an amendment of WDRs is to be considered by the Board because of an AROWD.
		75.	Finding No. 51: What is the status of the EMP for the extraction trench area.	Evaluation Monitoring Program (EMP) for high concentrations of inorganic constituents at the extraction trench area is combined with the EMP for detection of VOCs at MW-10.
		76.	Requirement A.1: Because of the landfill's proximity to the Los Angeles Reservoir, green wastes as alternated daily cover should be unacceptable at this site.	Refer to Comment/Response No. <b>5.K.</b>
		77.	Requirement B.4: The Board needs to restrict all radioactive material at the site because of the landfill's proximity to the Los Angeles Reservoir.	Refer to Comment/Response No. <b>5.P.</b>
		78.	Requirement B.5: There should be a requirement to prevent suspected medical waste from being buried at the landfill when State inspectors fail to show up.	Refer to Comment/Response No. <b>5.N.</b>
		79.	Requirement No. C.2.g. BFI should be denied access to the City sewer and required to build a new connection the San Fernando Road for the discharge of leachate and gas condensate. If not, they should at least be required to investigate the impact of its discharge to the community.	Refer to Comment/Response No. <b>5.G.</b>

No.	Commenter (Date Received)	Item	Comment	Response
		80.	Requirement No. E.12 and E.13: All water used onsite must be processed through the leachate collection plant. This should also be required of water entering the City sewer since noxious odors seem to coincide with the release of subdrain water into the sewer close to the residents.	Regional Board requires treatment of any water used onsite that does not meet the standards contained in WDRs prescribed for the use. At the Sunshine Canyon Landfill, the requirements are included in the WDRs for the County Extension Landfill (Order No. 91-091).  Refer to Comment/Response No. 9.H for treatment requirements of water discharged to the sanitary sewer system.
		81.	Monitoring and Reporting Program (M&RP), Section No. A.8.f: This is a very ineffective program, since it is rarely possible to identify the source without the use of video cameras at the working face. How often has anyone been cited over the period of your first WDRs? What penalties were imposed?	The California Integrated Waste Management Board (CIWMB) and the City of Los Angeles are the lead agencies for the load-checking at Class III landfills. Incidents of unacceptable materials are recorded and reported to the City as well as the Regional Board. Statistics on the enforcement of these requirements are currently not available.
		82.	M&RP Section No. B.1: Testing for all Appendix II constituents should be required at least annually.	As stated in Finding No. 58 of the tentative WDRs, BFI is required to monitor leachate from the City Landfill and narrow the scope of the constituent of concerns (COC) list to include, from Appendix II, only those constituents that have been detected and verified in leachate. By monitoring for detectable COCs, and any foreseeable breakdown products, BFI will be monitoring for all Appendix II constituents that could be released from the landfill. This has been the policy applied to landfills throughout the State of California.
		83.	M&RP Table T-1 and Section II.B.7.a: The Board should require quarterly well testing on at least all downgradient wells.	Quarterly monitoring is currently required at monitoring wells MW-1, MW-7, MW-9, MW-10, MW-13, and the groundwater extraction trench. Board staff believe that this will detect and allow evaluation of any pollution at the downgradient area. The monitoring frequency may be increased in the future as necessary.



No.	Commenter (Date Received)	Item	Comment	Response
		84.	M&RP Table T-1 and Section II.B.7.a: Is the County testing program the same or different from the City Side? If different, in what way?	The Monitoring and Reporting Program currently implemented at the County Extension Landfill is consistent with the Super Order and is different from what is implemented at the City Side Landfill. As a consequence of the detection of VOCs in the County Extension subdrain water, Board staff is in the process of issuing an Evaluation Monitoring Program (EMP) at the County Extension Landfill. The monitoring program to be required in the EMP at the County Extension Landfill will be consistent with what is proposed for the City Side Landfill.
		85.	M&RP Section II.B.11.a: Are all trace metals included in the monitoring of the leachate? The testing schedule should be quarterly.	Leachate monitoring includes all Appendix II pollutants, including trace metals.  The purpose of leachate testing is to find out what pollutants exist in the leachate, not to detect any release from the landfill. Annual testing is adequate for this purpose. If any new pollutants are detected in the leachate, BFI must repeat the testing within six months.
		86.	Statistics from the reports be made as easily understandable as possible with actual values attached to quantities of a component rather than a less than sign and that the allowable limits under State and Federal standards be included.	Board staff will work to make monitoring reports more accessible and understandable.
41.	David Edwards, BFI (Continue From Comment No. 18)	A	Finding No. 4 should be amended to state that the Main city Landfill Area and the North City Landfill Area ceased accepting waste <u>in</u> 1991.	Tentative WDRs amended as requested.
		B	Finding No. 21: change “grave” to “gravel”.	Typographic error corrected as requested.
		C	Finding No. 64: the WDRs should be clarified to reflect that in some instances a statistical method may be more appropriated that a non-statistical method.	The Finding does not preclude the use of statistical methods in such instance. It is therefore unnecessary to amend the tentative WDRs.
		D	Finding No. 67: change “SERI” to “SEIR”	Typographic error corrected as requested.

No.	Commenter (Date Received)	Item	Comment	Response
		E	Section A.2: BFI is not authorized to perform composting of green waste at Sunshine Canyon Landfill.	Refer to Comment/Response No. 9.A.
		F	Section A.3: Some of the acceptable wastes set forth in this paragraph may be prohibited by the City of Los Angeles.	Refer to Comment/Response No. 9.A.
		G	Section B.4. and B.5.: BFI is not authorized to accept radioactive waste or untreated medical waste pursuant to the City entitlement.	Refer to Comment/Response Nos. 5.P and 9.A
		H	Section B.8: The requirement is similar to Section C.4. and E.11.	Section E.8 has been deleted from the tentative WDRs because it repeats Section E.11.
		I	Section F.1: Replace “ <i>final closure activities</i> ” with “ <i>final closure <u>construction</u> activities</i> ”, because performance monitoring, which is part of final closure activities, takes more than 180 days to accomplish.	Section F.1. of the tentative WDRs have been amended as proposed.
		J	Section J.3 and J.4: These requirements are inconsistent with E.12 and E.13.	Section E.12 and E.13 are site operation requirements, while Section J.3 and J.4 are for the reuse of leachate and gas condensate onsite, if such reuses are permitted. There is no conflict between these requirements.
		K	Section J.6: The requirement should be modified to reflect the fact that non-storm water is discharged at sanitary sewer.	This section has be amended to read “ <i>During periods of precipitation, when the use of irrigation or dust control is not necessary for the purposes specified in this Order, all non-storm water collected at the site shall be stored or disposed of at a legal point of disposal.</i> ”
		L	Sections B.2 and B.9.b.i of the Monitoring and Reporting Program should be modified to allow the reporting to the Regional Board by faxing.	Sections B.2 and B.9.b.i have been modified to allow faxing as a method of reporting to the Regional Board.

No.	Commenter (Date Received)	Item	Comment	Response
42.	Paul Camellari (Continue From Comment No. 19)		The geological condition at the site does not provide adequate protection to water resources. Because of the great potential for contamination of surface and groundwater supplies, the proposed landfill must be denied.	Refer to Comment/Response No. 1.
43.	John and Sue Hendricks (Continue From Comment No. 21)	A	The expansion of the Sunshine Canyon Landfill is ill conceived and has no nexus because LA County has brokered long-term waste collection agreements with Mesquite and Eagle Mountain Landfills.	Refer to Comment and Response No. 16.
		B	The City of Los Angeles Planning Department has stated that the liner system for the proposed project, combined with monitoring and leachate control systems, are sufficient to mitigate potential impacts from the landfill on the San Fernando Groundwater Basin, while the tentative WDRs states that pollutants released from the landfill can potentially be carried to the basin. Please explain the major discrepancy between the two statements.	The two statements are not in conflict with each other. Because of the <i>potential</i> release of pollutants from the landfill to water resources, it is necessary for the Regional Board to regulate the proposed landfill expansion with WDRs. Board staff believe that the tentative WDRs are adequate to prevent (or mitigate) any pollutants from being release from the landfill to the groundwater basin.
		C	Do landfill pollutants via sub-strata or air borne particulates potentially pose a threat to the San Fernando Groundwater Basin, reservoirs, and aqueduct?	Refer to Comment/Response No. 1
		D	Can BFI eliminate 100% of the potential threat to water resources?	No. However, it is believed that the tentative WDRs will adequately protect surface and groundwater quality.

No.	Commenter (Date Received)	Item	Comment	Response
		E	Given that pollutants cannot be mitigated forever and will eventually enter the surrounding groundwater surrounding groundwater under and around even a double lined landfill, how is it possible for the Regional Board, charged with protection of our water, could permit the landfill expansion.	The Regional Board adopts WDRs for landfills in accordance with current Federal and State regulations, which the Board believes are protective of water quality. Academic studies and scientific investigation often draw conclusions that do not fit well with existing regulations. However, until the regulations are changed or modified, the Regional Board, as a regulatory agency, must act in accordance with the regulations.
		F	Regarding the geological information provided in Finding Nos. 20 through 31, who is the author of the said statements? Who was the author employed by while making the geological study? What is the date of said study? Is the study available for examination?	Under the California Water Code and 27 CCR, landfill operators must provide adequate site information, including geological data, to the Regional Board when applying for WDRs. The geological information included in the WDRs was obtained from the Joint Technical Document (JTD) submitted by BFI, the SEIR certified by the City of Los Angeles, existing Board Orders, and the Regional Board Basin Plan. All these documents are available for review at the Regional Board office.
		G	What is the status of the Los Angeles Board of Supervisors endeavor to purchase or use the Mesquite Landfill and Eagle Mountain Landfill?	Unknown. Concerned parties are encouraged to contact the Los Angeles County Board of Supervisors.
		I	Who will be the legally liable party when pollutants begin to appear in the area's water systems?	BFI is the legally liable party for any pollution the landfill may cause during the operation or post-closure period.